

Section 1. Registration Information

Source Identification

Facility Name:	ASHLAND SPECIALTY INGREDIENTS G.P. - PARLIN PLANT
Parent Company #1 Name:	ASHLAND INCORPORATED
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	02-Jun-2020
Postmark Date:	02-Jun-2020
Next Due Date:	02-Jun-2025
Completeness Check Date:	27-Sep-2020
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0005 2676
Other EPA Systems Facility ID:	08859HRCLSSOU
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	1315647
Parent Company #1 DUNS:	1315647
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	50 SOUTH MINISINK AVENUE
Street 2:	
City:	PARLIN
State:	NEW JERSEY
ZIP:	08859
ZIP4:	1089
County:	MIDDLESEX

Facility Latitude and Longitude

Latitude (decimal):	40.458611
Longitude (decimal):	-074.337500
Lat/Long Method:	GPS Code Measurements (Psuedo Range) Standard Positioning Service SA ON
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	1

Horizontal Reference Datum Name:

North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name:

ASHLAND SPECIALITY INGREDIENTS GP

Operator Phone:

(732) 353-7700

Mailing Address

Operator Street 1:

50 SOUTH MINISINK AVENUE

Operator Street 2:

Operator City:

PARLIN

Operator State:

NEW JERSEY

Operator ZIP:

08859

Operator ZIP4:

1089

Operator Foreign State or Province:

Operator Foreign ZIP:

Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:

David Bamford

RMP Title of Person or Position:

PLANT MANAGER

RMP E-mail Address:

david.bamford@Ashland.com

Emergency Contact

Emergency Contact Name:

David Bamford

Emergency Contact Title:

Plant Manager

Emergency Contact Phone:

(732) 353-7701

Emergency Contact 24-Hour Phone:

(732) 270-3773

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address:

david.bamford@Ashland.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

(732) 353-7700

Facility or Parent Company WWW Homepage
Address:

Local Emergency Planning Committee

LEPC:

Sayreville LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:

75

FTE Claimed as CBI:

Covered By

OSHA PSM :

Yes

EPCRA 302 : Yes
CAA Title V:
Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking: Y

Last Safety Inspection

Last Safety Inspection (By an External Agency) 06-Jul-2019
Date:
Last Safety Inspection Performed By an External Agency: State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name: Laurie Cooper
Preparer Phone: (732) 353-7715
Preparer Street 1: 50 South Minisink Avenue
Preparer Street 2:
Preparer City: Parlin
Preparer State: NEW JERSEY
Preparer ZIP: 08859
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID: 1000109584
Description: NATROSOL
Process Chemical ID: 1000136903
Program Level: Program Level 3 process
Chemical Name: Ethylene oxide [Oxirane]
CAS Number: 75-21-8
Quantity (lbs): 1228000
CBI Claimed:
Flammable/Toxic: Toxic

Process NAICS

Process ID:	1000109584
Process NAICS ID:	1000110870
Program Level:	Program Level 3 process
NAICS Code:	325998
NAICS Description:	All Other Miscellaneous Chemical Product and Preparation Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000088029

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	DNV Process Hazard Analysis Software (Phast) Version 8.2
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	Yes
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000093698

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	DNV Process Hazard Analysis Software (Phast) Version 8.2
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

- Dikes:
- Enclosures:
- Berms:
- Drains:
- Sumps:
- Other Type:

Active Mitigation Considered

Sprinkler System:	
Deluge System:	Yes
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	WATER SPRAY

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

ETHYLENE OXIDE

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000116356
Chemical Name:	Ethylene oxide [Oxirane]
Flammable/Toxic:	Toxic
CAS Number:	75-21-8

Process ID:	1000109584
Description:	NATROSOL
Prevention Program Level 3 ID:	1000093097
NAICS Code:	325998

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	16-Jul-2019
---	-------------

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	30-Oct-2018
---	-------------

The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2022

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes

Earthquake:
Floods (Flood Plain):
Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	Yes
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	Yes
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:

Installation of Process Controls: Yes
Installation of Process Detection Systems:
Installation of Perimeter Monitoring Systems:
Installation of Mitigation Systems:
None Recommended:
None:
Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 27-Mar-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs): 07-May-2020

The Type of Training Provided

Classroom: Yes
On the Job: Yes
Other Training:

The Type of Competency Testing Used

Written Tests: Yes
Oral Tests: Yes
Demonstration: Yes
Observation: Yes
Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 15-Nov-2019

Equipment Inspection Date (The date of the most recent equipment inspection or test): 30-Jun-2016

Equipment Tested (Equipment most recently inspected or tested): T-505-B EO storage tank

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 17-Sep-2019

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 28-Aug-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 14-Oct-2019

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 31-Dec-2019

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 31-Dec-2022

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 25-Oct-2019

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 10-Dec-2019

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 17-Apr-2020

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 17-Apr-2020

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 26-Mar-2020

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 14-Sep-2015

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): SAYREVILLE LEPC

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (732) 525-5463

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

Executive Summary

Executive Summary - Ashland Specialty Ingredients GP (ASI) Parlin RMP submittal.

ASI is a wholly owned subsidiary of Ashland LLC. The Parlin, NJ plant is part of the Ashland Specialty Ingredients business unit.

Policy:

Ashland Inc. ("Ashland") is committed to protecting the environment and ensuring the health, safety and security of our employees, their families and the communities where we work and live. We strive to provide exceptional product stewardship in support of our customers, suppliers and the markets that we serve. We work to be an industry leader in these areas and we are committed to operating our global facilities and businesses using the principles of Responsible Care.

Responsible Care Goals

Ashland's core values, principles, and commitments are reflected in these Responsible Care goals:

Operate with zero incidents. We believe that all injuries, occupational illnesses and incidents are preventable and we are committed to operating with a zero-incident culture. Our culture engages all employees and also promotes off-the-job-safety and environmental stewardship for our employees and their families. We design, build and operate our facilities to be safe, secure and protective of the environment and the local community.

Ensure compliance. We are committed to ensuring compliance with applicable environmental, health, safety and security laws, regulations, technical specifications and internal standards, while adhering to high ethical standards.

Reduce environmental, health, safety, and security impact. We are committed to continuously improving our processes and to providing products and services that throughout their life-cycle involve minimum risk to people and the environment, while best meeting the needs of our customers. We are committed to the continual reduction of the impact of our operations and products in support of global sustainability efforts. We strive to eliminate or reduce emissions, discharges, and wastes from our operations and to promote energy efficiency and resource conservation throughout the value chain.

We maintain an open dialogue with our employees and communities about environmental, health, safety, security and product stewardship issues. We work with governments, policy makers, advocacy groups and value chain partners to develop and promote laws, regulations and practices that improve human health and the environment.

Our Responsible Care management system provides the foundation to achieve our Responsible Care goals. We are committed to continually improving our processes and performance across our global businesses. We measure and regularly report our performance to our stakeholders.

We work with our customers, suppliers, carriers and distributors to ensure product safety and enhance product stewardship. We develop and produce products that can be manufactured, distributed, used, and recycled or disposed of in a safe, secure and environmentally sound manner. We provide product safety information throughout the value chain so our customers and end-users can understand and manage risk and provide meaningful and relevant information to their respective stakeholders.

Conforming to this policy is the responsibility of every employee as a condition of employment and of contractors that act on our behalf. Ashland management will lead by example as well as educate and train employees and stakeholders.

ZERO INCIDENT CULTURE (ZIC)

- **Leadership** - Leaders cultivate a culture where Environmental, Health, Safety (EHS) is fully integrated. This cornerstone provides the structure and the expected activities to facilitate appropriate leadership behaviors, tasks and activities to achieve our ZIC.

- **Employee Engagement** - Engaging our employees in our processes and the improvements to those processes is vital in developing ownership. This cornerstone provides the structure and activities to facilitate engaging our employees in our processes and fostering ownership and accountability for achieving a ZIC.

- **Risk Reduction** - Employees recognizing risk and taking action to mitigate those risks is critical in preventing incidents from occurring. This cornerstone provides the structure and activities to facilitate the proactive processes for identification of risk reduction and near-misses, resulting in a safer work environment and behaviors necessary to achieve a ZIC.

- **Performance Measurement** - Measuring our performance provides our direction for continuously improving our processes. Through monitoring, measuring, investigating and establishing corrective/preventive actions, this cornerstone is crucial in building our ZIC.

Facility Description:

The primary activity at the Parlin Plant is the manufacture of Natrosol A[®]; (hydroxyethyl cellulose). Natrosol A[®]; is used as a thickener in latex paint and personal care products. The primary ingredients in Natrosol A[®]; are cellulose (wood or cotton linter fiber) and ethylene oxide. Ethylene oxide is received in 25,000-gallon railroad tank cars and stored in two tanks, each limited to 27,000 gallons by administrative controls. The tanks are protected from having direct sunlight on them by a sun shield. The ethylene oxide unloading and storage area is provided with containment dikes and pits in which a spill can be diluted with water. This facility is also equipped with leak detectors and fixed water spray nozzles to minimize any adverse impacts if there were a spill.

Worst Case Scenario:

No longer required.

Alternative Case Scenario:

No longer required.

Accident Prevention Program:

The use of ethylene oxide at Parlin has been subject to the New Jersey Toxic Catastrophe Prevention Act (TCPA) regulations since their adoption in 1988, as well as the subsequently adopted OSHA Process Safety Management standard (29CFR 1910.119). The plant has an established risk management system in place to meet these requirements and to minimize the potential for accidental release of these substances. Our management system includes:

1. Process hazard analysis to identify and address potential hazards.
2. Management of change procedures to assure that standards are maintained and potential new hazards assessed.
3. Mechanical integrity procedures for minimizing mechanical failures, Detailed operating procedures for process control
4. Training for the personnel involved in operating and maintaining the processes.
5. Facility design incorporates multiple layers of incident prevention.

Five Year Accident History:

In the past five years, the Parlin plant has not had any accidental releases of ethylene oxide that resulted in on-site injuries or damage or any off site impacts.

Emergency Response Program:

The Parlin plant has a written emergency response plan and coordinates emergency response matters with the Sayreville Office of Emergency Management (L.E.P.C.). The plant provides emergency response training for all plant employees. Emergency response exercises are conducted at least annually.

Planned Changes to Improve Safety: Safety improvement is an ongoing process usually driven by safety reviews, process hazard analysis or site vulnerability assessment. No major safety changes are currently planned.